

## T. A. BLACKBURN LAW

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September 1, 2021

Hon. Judge Madeline Cox Arleo

United States District Court District of New Jersey 50 Walnut Street #4015 Newark, NJ 07102

## **Update on Service of Process**

Re: Miller v. Johnson C. Smith University, INC. et al. No. 2:21-cv-15313 MCA-MAH

Dear Judge Arleo,

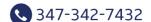
I am an attorney duly admitted to practice before this Court. In the above matter, my law firm T. A. Blackburn Law, PLLC., is the attorney for Plaintiff Queen Miller ("Ms. Miller").

We write to inform you that my office is in contact with Johnson C. Smith University's ("JCSU") current counsel, Parker, Poe, Adams & Bernstein, LLP. They are assessing if JCSU will allow them to accept service of process under rule 4 for the FRCP. Additionally, the following defendants are current or recent employees of JCSU, and the firm is also assessing whether JCSU intended to indemnify them and have Parker Poe represent them. The defendants are Upward Bound, Michael Gardner, Magdalyn Lowe-Smith, Treva Norman, and Kathleen Jackson.

Defendants Michael Peterson and Dorothy Cowser Yancy have been served. If JCSU refuses to accept services under rule 4 of the FRCP by September 3, 2021, we will file a motion for an extension of time to severe the remaining defendants individually.

Respectfully,

Tyrone A. Blackburn, Esq.
Tyrone A. Blackburn, Esq. T. A. Blackburn Law, PLLC.





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